

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re: § § Chapter 11
CHESTNUT RIDGE ASSOCIATES LLC § Case No. 23-90069
§
§
Debtor. §

**STIPULATION AND AGREED ORDER FURTHER EXTENDING
DEADLINES TO (I) OBJECT TO FINAL APPROVAL OF THE AMENDED
DISCLOSURE STATEMENT AND CONFIRMATION OF THE AMENDED
CHAPTER 11 PLAN OF REORGANIZATION AND (II) RESPOND TO OBJECTIONS
TO FINAL APPROVAL OF THE AMENDED DISCLOSURE STATEMENT AND
CONFIRMATION OF THE AMENDED CHAPTER 11 PLAN OF REORGANIZATION**

[Related to Docket Nos. 104, 135]

This *Stipulation and Agreed Order Further Extending Deadlines to (I) Object to Final Approval of the Amended Disclosure Statement and Confirmation of the Amended Chapter 11 Plan of Reorganization and (II) Respond to Objections to Final Approval of the Amended Disclosure Statement and Confirmation of the Amended Chapter 11 Plan of Reorganization* is made by and between (i) Chestnut Ridge Associates LLC (the “Debtor”) and (ii) Kingsgate Partner, LLC (“Kingsgate,” and together with the Debtor, the “Parties”).

WHEREAS, on February 5, 2023 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code in Case No. 23-90069;

WHEREAS, On May 21, 2023, the Debtor filed the *Amended Chapter 11 Plan of Reorganization for Chestnut Ridge Associates LLC* [Docket No. 99] (the “Plan”);

WHEREAS, on May 21, 2023, the Debtor filed the *Amended Disclosure Statement for the Amended Chapter 11 Plan of Reorganization for Chestnut Ridge Associates LLC* [Docket No. 100] (the “Disclosure Statement”);

WHEREAS, on May 22, the Court entered the *Order (A) Conditionally Approving Disclosure Statement; (B) Scheduling Combined Hearing on Final Approval of Disclosure Statement and Confirmation of Plan, and Setting Related Deadlines; (C) Approving Forms for Voting and Notice; and (D) Granting Related Relief* [Docket No. 104] (the “Solicitation Order”);

WHEREAS, pursuant to the Solicitation Order, the original deadline to file any objection to final approval of the Disclosure Statement and/or confirmation of the Plan was July 8, 2023 (the “Original Objection Deadline”);

WHEREAS, pursuant to the Solicitation Order, the original response deadline to any objection to final approval of the Disclosure Statement and/or confirmation of the Plan was July 13, 2023 (the “Original Response Deadline”);

WHEREAS, pursuant to the Solicitation Order, the deadline to file Witness and Exhibit List is July 14, 2023 (“Original W&E Deadline”);

WHEREAS, on July 7, 2023, the Parties filed the *Stipulation and Agreed Order Extending Deadlines to (I) Object to Final Approval of the Amended Disclosure Statement and Confirmation of the Amended Chapter 11 Plan of Reorganization and (II) Respond to Objections to Final Approval of the Amended Disclosure Statement and Confirmation of the Amended Chapter 11 Plan of Reorganization* [Docket No. 131] requesting that the Original Objection Deadline be extended to July 14, 2023 and the Original Response Deadline to July 24, 2023;

WHEREAS, on July 7, 2023, the Court entered the *Stipulation and Agreed Order Extending Deadlines to (I) Object to Final Approval of the Amended Disclosure Statement and Confirmation of the Amended Chapter 11 Plan of Reorganization and (II) Respond to Objections to Final Approval of the Amended Disclosure Statement and Confirmation of the Amended Chapter 11 Plan of Reorganization* [Docket No. 135], extending the Original Objection Deadline to July

14, 2023 (the “Extended Objection Deadline”) and the Original Response Deadline to July 24, 2023 (the “Extended Response Deadline”);

WHEREAS, on July 12, 2023, the Parties filed the *Stipulation and Agreed Order Further Extending Deadlines to (I) Object to Final Approval of the Amended Disclosure Statement and Confirmation of the Amended Chapter 11 Plan of Reorganization and (II) Respond to Objections to Final Approval of the Amended Disclosure Statement and Confirmation of the Amended Chapter 11 Plan of Reorganization* [Docket No. 135], requesting that the Extended Objection Deadline be extended to to July 21, 2023 (the “Current Objection Deadline”) and the Extended Response Deadline to July 28, 2023 (the “Current Response Deadline”); and

WHEREAS, the Debtor and Kingsgate have engaged in discussions with respect to the Plan and Disclosure Statement and have stipulated and agreed to the following:

IT IS THEREFORE ORDERED THAT:

1. The Current Objection Deadline is **EXTENDED** to July 25, 2023;
2. The Original W&E Deadline is **EXTENDED** to July 28, 2023;
3. The Current Response Deadline is **EXTENDED** to August 1, 2023; and
4. This Court shall retain exclusive jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: _____, 2023.

UNITED STATES BANKRUPTCY JUDGE
JUDGE DAVID R. JONES

APPROVED AS TO FORM AND SUBSTANCE:

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